

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

**MEMORANDUM IN SUPPORT OF
DEFENDANTS' MOTION TO SEAL**

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel, pursuant to Local Civil Rule 5, submit this memorandum of points and authorities in support of Defendants' Motion to Seal.

1. Defendants agreed to a Stipulated Protective Order (Dkt. 45) which requires the parties to file information labeled as confidential under seal with the Court.
2. Pursuant to the Stipulated Protective Order (Dkt. 45), Plaintiffs labeled their Answers to Defendants' Requests for Admission, attached as Exhibit E to Defendants' Motion to Compel filed on October 14, 2016, as confidential.
3. Defendants also cited to Plaintiffs' Answers to Defendants' Requests for Admission in the memorandum supporting Defendants' Motion to Compel.
4. Because Plaintiffs have labeled this information as confidential pursuant to the Stipulated Protective Order (Dkt. 45), Defendants have filed this Motion to Seal pursuant to Local Civil Rule 5.

5. Until the Court determines whether Exhibit E to Defendants' Motion to Compel should be sealed, Defendants have redacted Exhibit E from Defendants' Motion to Compel and filed a redacted version of the memorandum in support of Defendants' Motion to Compel.

WHEREFORE, Defendants respectfully submit their Motion to Seal for consideration by the Court.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of October, 2016, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

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